

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
Washington, D.C.**

**BID PROTEST**

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NAVIENT SOLUTIONS, LLC

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

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CFC No. 18-1679 C

Judge \_\_\_\_\_

**MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff Navient Solutions, LLC ("Navient"), through undersigned counsel, respectfully requests that the Court file under seal Plaintiff's Complaint. Plaintiff's Complaint contains Navient confidential and proprietary information, the release of which could cause substantial and irreparable harm to Navient.

Pursuant to the Court's rules, Navient is simultaneously filing a redacted copy of the Complaint that is suitable for public release. In light of the terms of the Court's sample protective order, we respectfully request that the redacted version of the Complaint not be released outside the Court or the government until approved for public release by counsel for the U.S. Department of Justice.

Filing under seal is necessary to ensure continued protection of sensitive data protected by the Federal Acquisition Regulation as permitted by this Court's Rules.

Respectfully submitted,

Date: October 31, 2018

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## **CERTIFICATE OF SERVICE**

I certify that I have caused a true and accurate copy of Navient Solutions, LLC's Motion for Leave to File Under Seal to be delivered by the delivery method indicated below on the 31st day of October 2018 to the following:

United States Department of Justice (*via electronic mail*)  
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/s/ Jonathan D. Shaffer  
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